

EXHIBIT 15

DEPOSITION OF HEATHER BAUGH

1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

-ooOoo-

JOSHUA CHATWIN, : CIVIL NO. 2:14-cv-375

Plaintiff, : DEPOSITION OF:
HEATHER BAUGH

v. :

TAKEN: December 9, 2015

DRAPER CITY; Draper City :
Police Department; Judge Dale A. Kimball

OFFICER J. PATTERSON, in :
his individual and
official capacity; :

OFFICER HEATHER BAUGH,
in her individual and
official capacity;

OFFICER DAVID HARRIS, in
his individual and
official capacity;

OFFICER KURT IMIG, in
his individual capacity;
SUPERVISOR TBA; and JOHN
DOES 1-10,

Defendants.

-ooOoo-

Deposition of HEATHER BAUGH, taken on behalf
of the plaintiff, at 201 South Main Street, Suite
1300, Salt Lake City, Utah, before PHOEBE S.
MOORHEAD, Certified Shorthand Reporter for the State
of Utah, pursuant to Notice.

1 And then in the bottom left, on the very
2 bottom, this time, very bottom, it says, "Adopted
3 2013/03/28." Do you see that?

4 A. I do.

5 Q. All right. Then at the end of that, it says,
6 "Lexipol, LLC"?

7 A. Correct.

8 Q. Do you know who Lexipol is?

9 A. I do not.

10 Q. And is it fair to say, based on that date,
11 that these are the policies of the Draper City Police
12 Department on the use of force on March 28, 2013?

13 A. Correct.

14 Q. All right. Now, have you seen this policy
15 before?

16 A. The Draper City use of force?

17 Q. Yeah. This exact one I'm showing you now.

18 A. I have. It does not apply to me.

19 Q. But you still have to be familiar with it?

20 A. I do not.

21 Q. I thought you said you had to be familiar with
22 the Draper City Police Department --

23 A. I am familiar with the policies. Some do
24 apply, and some do not apply to me as an animal control
25 officer.